

LPDES PERMIT NO. LA0086452, AI NO. 2448, ACTIVITY NO. PER20080001

**LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

COMPANY/FACILITY: El Paso Corporation
Tennessee Gas Pipeline (TGP) Compressor Station 527
26166 LA Highway 23
Port Sulphur, Louisiana 70083

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

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DATE PREPARED: October 6, 2008

I. PERMIT STATUS

A. Reason For Permit Action:

Proposed reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

In order to ease the transition from NPDES to LPDES permits, dual regulatory references are provided where applicable. The LAC references are the legal references while the 40 CFR references are presented for informational purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401, 405-415 and 417-471 have been adopted by reference at LAC 33:IX.4903 and will not have dual references. In addition, state standards (LAC 33:IX.Chapter 11) will not have dual references.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, and 2301.F.

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 2

- B. LPDES permit effective date: February 1, 2004
LPDES permit expiration date: January 31, 2009
- C. Application was received on August 4, 2008. Additional information received via email correspondence October 22, 2008 and via mail correspondence received October 27, 2008

II. FACILITY INFORMATION

A. Location:

26166 LA Highway 23, Port Sulphur, Plaquemines Parish
Latitude: 29° 30' 59.9", Longitude: 89° 43' 42.6"

B. Applicant Activity:

According to the application, El Paso Corporation, Tennessee Gas Pipeline (TGP) Compressor Station No. 527 is an existing facility that is primarily a natural gas compressor station. This compressor station is used to maintain line pressure and flow rate in the TGP's natural gas pipeline. Maintenance activities for the line are also conducted here. The area drained of stormwater is approximately 20 acres, of which three (3) acres consist of impervious surfaces. Herbicides are used for weed control. All sanitary wastewater discharges are sent to the Port Sulphur Publicly Owned Treatment Works (POTW). TGP Compressor Station 527 facility was greatly impacted by Hurricane Katrina. General sanitary permit LAG531983 was issued for two mobile homes with twelve bunks each and clothes washing facilities for temporary housing provided for employees displaced due to the storm. The sanitary water was redirected to the POTW after all the plant repairs were completed. The facility has submitted a request to terminate LAG531983.

C. Technology Basis:

40 CFR Chapter I, Subchapter N, Effluent Guidelines and Standards, Parts 401, 405-417 and 421-471 as adopted by reference in LAC 33:IX.4903.

<u>Guideline</u>	<u>Reference</u>
NA	NA

Other sources of technology based limits:

Current Permit (Effective February 1, 2004)
Similar Outfalls at Existing Facilities
Best Professional Judgment

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 3

D. Fee Rate:

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC codes: 4922

E. Continuous Facility Effluent Flow:

0.0454 Million gallons per day (MGD)

III. RECEIVING WATERS:

A. Stream:

Unnamed drainage ditch, thence to Louisiana Highway 23 drainage ditch, thence to City Price Drainage Canal

B. Basin and Subsegment:

Barataria River Basin, Subsegment 020907

C. Designated Uses:

The designated uses of this subsegment in the Barataria River Basin are primary contact recreation, secondary contact recreation, propagation of fish and wildlife and oyster propagation

IV. OUTFALL INFORMATION

Outfall 001:

A. Discharge Type:

The continuous discharge of treated wastewater from equipment pads and process areas, air compressor system condensate, compressor building drain system, and equipment washwater.

B. Location:

At the point of discharge, after the rock reed filter, prior to combining with stormwater and waters of an unnamed drainage ditch at Latitude 29° 30' 53", Longitude 89° 43' 49".

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 4

C. Treatment:

Two oil and water separators are employed in series (weir and vessel type) with biological treatment through a rock reed filter.

D. Flow:

Continuous at 0.04549 MGD

V. PROPOSED CHANGES FROM PREVIOUS PERMIT:

- A. The subsegment has changed from 021001 to 020907 due to changes in subsegment mapping techniques.
- B. Outfalls 002 and 003 have been deleted from this permit. Due to changes to the facility caused by Hurricanes Katrina and Rita, these stormwater outfalls are no longer considered point discharge sources and are now designated as sheet flow. All process wastewaters that were present in either of these outfalls are now diverted to Outfall 001.
- C. The quantity and types of soaps and/or detergents discharged at Outfall 001 will no longer be reported on the Discharge Monitoring Reports. The Part II requirement L. Best Management Practices (BMP) – Washdown Wastewaters has been established to address the documentation of the use of soaps and/or detergents in washwater.

VI. PERMIT LIMIT RATIONALE:

The following section sets forth the principal facts and the significant factual, legal, methodological and policy questions considered in preparing the draft permit. Also, set forth are any calculations or other explanations of the derivation of specific effluent limitation and conditions, including a citation to the applicable effluent limitation guideline or performance standard provisions as required under LAC 33:IX.2707 and reasons why they are applicable or an explanation of how the alternate effluent limitations were developed.

A. Outfall 001:

The continuous discharge of treated wastewater from equipment pads and process areas, air compressor system condensate, compressor building drain system, and equipment washwater.

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 5

Utility wastewaters and stormwater runoff being discharged to Outfall 001 receive BPJ limitation/monitoring requirements according to the following schedule:

PARAMETER	MONTHLY AVERAGE (LBS/DAY)	DAILY MAXIMUM (LBS/DAY)	MONITORING FREQUENCY
Flow-MGD	Report	Report	1/month
TOC	---	50 mg/L	1/month
COD	---	125 mg/L	1/month
Oil & Grease	---	15 mg/L	1/month
Soaps and/or Detergents	Report	---	1/month
pH(standard units)	6.0	9.0	1/month

Site Specific Considerations for Outfall 001

Flow is established in accordance with LAC 33:IX.2707.I.1.b. Flow shall be monitored at a frequency of once per month when discharging and reported on the DMR as an estimate. These requirements have been retained from the current LPDES permit, effective on February 1, 2004.

TOC, COD and Oil and Grease limitations and/or monitoring requirements are established based on best professional judgment. TOC, COD and Oil and Grease shall be monitored at a frequency of once per month when discharging and collected as a grab samples. These requirements have been retained from the current LPDES permit, effective on February 1, 2004.

pH is established in accordance with LAC 33:IX.1113.C.1. pH shall be monitored at a frequency of once per month when discharging and collected as a grab sample. These requirements have been retained from the current LPDES permit, effective on February 1, 2004.

Soaps and/or detergents monitoring requirements are established based on best management practices. These requirements have been retained from the current LPDES permit, effective on February 1, 2004.

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 6

VII. TMDL WATERBODIES

Subsegment No. 020907 of the Barataria Basin is not listed on the 2006 Final Integrated 303(d) List as impaired, and to date, no TMDLs have been established. Based on an evaluation of this facility's discharges, it is determined that the permittee has no reasonable potential to discharge any wastewaters which would be expected to result in non-attainment of the subsegment's designated uses. A reopener clause has been established and placed in Part II of the permit to allow for the requirement of more stringent or additional limitations or requirements as imposed by any future TMDLs.

VIII. COMPLIANCE HISTORY/DMR REVIEW

- A. There have been no compliance orders issued to Tennessee Gas Pipeline – Compressor Station No. 527 for the past 5 years as of October 28, 2008.
- B. The most recent inspection was conducted on June 4, 2002. The inspection indicated that all areas inspected were satisfactory.
- C. A file review of all DMRs submitted from October 4, 2003 through October 6, 2008 was conducted. No DMRs for Outfalls 002 and 003 were submitted. In addition, no DMRs were submitted for Outfall 001 for General Permit LAG531983. These issues have been presented to the LDEQ Enforcement Division for review.
- D. General Permit LAG531983 was not terminated upon conclusion of the repairs to the facility. This issue has been presented to the LDEQ Enforcement Division for further review.

IX. "IT" QUESTIONS

TGP Compressor Station No. 527 is an existing minor facility; therefore, responses to the IT Questions are not required for submission.

Statement of Basis
Tennessee Gas Pipeline Compressor Station 527
Draft Permit LA0086452
AI No.: 2448
Page 7

X. ENDANGERED SPECIES

The receiving waterbody, Subsegment 020907 of the Barataria River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 18, 2008, from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

XI. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

XII. TENTATIVE DETERMINATION

Based on preliminary staff review, the Department of Environmental Quality has made a tentative determination to permit for the discharge described in the application.

XIII. VARIANCES

This Office has received no requests for variances.

XIV. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) REQUIREMENT

In accordance with LAC 33:IX.2707.1.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all stormwater discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, that plan could be incorporated by reference into the SWP3. Examples of these type plans include, but are not limited to Spill Prevention Control and Countermeasure Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the

Statement of Basis

Tennessee Gas Pipeline Compressor Station 527

Draft Permit LA0086452

AI No.: 2448

Page 8

form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of storm water associated with industrial activity, as defined at LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].

XV. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing list